

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:) Chapter 11
)
Squirrels Research Labs LLC, <i>et al.</i> , ¹) Case No. 21-61491
) (Jointly Administered)
Debtors.)
) Judge Russ Kendig

**NOTICE OF FILING OF MOTION AND AN ORDER RELATED TO THE
AUCTION AND SALE OF CERTAIN ASSETS OWNED BY SQUIRRELS
RESEARCH LABS LLC AND THE MIDWEST DATA COMPANY LLC**

PLEASE TAKE NOTICE that on November 23, 2021, the above-captioned Debtors filed the Motion for an Order: (A)(I) Establishing and Approving Bid Procedures Related to the Sale of the Debtor's Properties Pursuant to 11 U.S.C. §§ 105(A), Including Designation of Stalking Horse Bidder and Related Bid Protections; (II) Approving Contract/Lease Assumption and Assignment Procedures and the Form and Notice Thereof; (III) Scheduling the Auction; (IV) Scheduling a Hearing and Objection Deadline with Respect to the Sale; (V) Approving the Form and Notice Thereof; and (VI) Granting Related Relief; and (B)(I) Authorizing Sale of Debtor's Properties Free and Clear of Liens, Claims, Encumbrances, and Interests Pursuant to 11 U.S.C. §§ 105 and 363; and (II) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases; and (C) Granting Related Relief [Docket # 6]

PLEASE TAKE FURTHER NOTICE that on December 1, 2021, the Court entered an order with respect to the Motion [Docket # 40] (the "Bidding Procedures Order") approving the procedures contemplated therein (the "Bidding Procedures") for the sale of the Assets (as defined in the Motion) [Docket # 6]. A copy of the Bidding Procedures is annexed to the attached Bidding Procedures Order as Exhibit 1. Pursuant to the Bidding Procedures Order, a final hearing to approve the Auction and Sale is scheduled to take place on January 11, 2022 at 2:00 p.m. (ET) (the "Sale Hearing").

PLEASE TAKE FURTHER NOTICE that, to ensure that the Auction and Sales process maximizes value, the following timeline and deadlines have been established by the Debtor and approved by the Court, pursuant to the Bidding Procedures Order:

Key Dates	
Date/Time	Event
December 17, 2021	Deadline by which Debtor must file the Cure Notice with the Court and serve the Cure Notice on the Contract Counterparties

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Squirrels Research Labs LLC (9310), case no. 21-61491 and The Midwest Data Company LLC (1213), case no. 21-61492.

December 31, 2021	Deadline by which Bids (as well as Deposits and all other documentation required under the Bidding Procedures) must be submitted in accordance with the Bidding Procedures
December 31, 2021	Deadline by which to file Assigned Contract Objections
January 3, 2022	Date on which Auction (if any) shall be held electronically via video/telephone, or at such later date, time, or other place, as selected by Debtor, in consultation with Avnet and the Stalking Horse Bidder, or approved by order of the Court.
January 10, 2022	Deadline by which objections to the Sale Transaction must be filed
January 11, 2022	Date on which the Sale Hearing shall occur, subject to the Court's availability

Dated: December 3, 2021

/s/ Julie K. Zurn
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 and Debtors-in-Possession*